



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

OFFICE OF THE
REGIONAL ADMINISTRATOR

SEP 21 2015

Steve Stenger
County Executive
Saint Louis County
41 South Central Avenue
Saint Louis, MO 63105

Dear County Executive Stenger:

Thank you for your August 26, 2015, letter regarding the West Lake Landfill. Your letter referred to the Missouri Department of Natural Resources' August 10, 2015, letter to Republic Services, and requested the U.S. Environmental Protection Agency's response to four questions.

I appreciate the opportunity to provide the EPA's views regarding the location of radiologically impacted material at the West Lake Landfill and the potential for a subsurface smoldering event to come into contact with the RIM.

Below I have enumerated your questions and provided the EPA's responses.

- 1. Does EPA Region 7 intend to perform a subsurface test for radioactive materials as a grid in the North Quarry?*

The EPA has no plans at this time to conduct grid sampling of the subsurface materials in the North Quarry. Earlier this year, the EPA Region 7 required the Potentially Responsible Parties to complete field work necessary to identify the extent of RIM in the southwestern and western portions of Operable Unit 1 Area 1, which shares a boundary with the North Quarry. Under the Phase ID work plan approved by the EPA, contractors began mobilizing at the site on May 11 and completed the fieldwork the week of July 20, 2015. Contractors, under the EPA's oversight, used Gamma Cone Penetrometer Testing to screen for gamma radiation at depth and used a sonic drilling rig to perform soil borings to collect soil core samples from GCPT locations that had elevated gamma readings. Methodology for sampling under the approved work plan required establishing a no-RIM line and performing "step outs" if needed. The sampling would also step back to known RIM locations to fill in data gaps. Several step outs extended into the North Quarry "muffin top" and ended before the former North quarry high wall. The validated data from the analysis of the soil core samples, which is due to be submitted to the EPA the first week of November, is necessary to confirm field screening data.

- 2. What is the timeline for implementation of the proposed isolation barrier?*

The EPA will make a decision about the proposed isolation barrier after we have completed our analysis of the validated data and associated reports from the RIM data collection efforts in OU1 Area 1. The

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EPA is also evaluating whether there is testing that could be performed on the RIM which would be helpful in making this decision, although it is not yet clear whether there are established analytical methods available which would be informative for decisions at the site. Note that if or when a decision is made to install a physical isolation barrier, additional time would be needed to design and construct the barrier depending on its location and type.

3. *Does EPA Region 7 have any other contingency plans to prevent the radioactive materials from encountering the smoldering fire other than the proposed isolation barrier?*

Based on the validated scientific data evaluated to date by our experts, the EPA does not believe that there is an imminent danger of a subsurface smoldering event encountering RIM. However we recognize the community's concerns regarding that possibility. We are thereby supportive of the MDNR's request of Bridgeton Landfill LLC to develop contingent corrective measures which could be implemented in the event future data substantiates the presence of a subsurface smoldering event in the North Quarry.

4. *Is EPA Region 7 prepared for an "emergency removal action" should one be necessary at the West Lake Landfill?*

The EPA has assisted St. Louis County and other local first responder entities in developing the current emergency response plan in the event there is a need for an action by local first responders. The action plan includes elements to address firefighting, emergency response, relocation, and technical assistance that can be provided by state and federal entities. The EPA participated in numerous conference calls, reviewed and commented on draft plans, and continues to serve in an advisory capacity with regard to that emergency response plan. Specifically, the EPA Superfund program personnel are part of the Westlake Landfill Emergency Planning Team. The team is comprised of St. Louis County Emergency Management, St. Louis County Health Department, MDNR, St. Charles and Bridgeton Fire Departments, and various other state and local agencies (i.e. Red Cross, Combat Support Staff, etc). The EPA will continue to offer our support to local emergency responders. In addition to such support, the EPA has authority under the Comprehensive Environmental Response, Compensation and Liability Act and the National Oil and Hazardous Substances Pollution Contingency Plan to take certain actions to respond to releases or threatened releases of hazardous substances into the environment that require a prompt response.

Again, thank you for your letter and your continued interest in the West Lake Landfill Site. As I related to you during our recent call, the primary mission of my office is to protect the health of the people who work at and live around the West Lake Landfill. To accomplish this goal, it is this agency's duty to complete the investigations necessary for supporting selection of a final remedy that protects human health and the environment, select the final remedy and implement that remedy. If you have any further questions relating to the site, please call Mary Peterson, Superfund Division Director at 913-551-7882.

Sincerely,



Mark Hague
Acting Regional Administrator